

OCT 13 2011

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Article Number: 7010 2780 0001 2210 3596

Mr. John Heer, Assistant General Counsel
Electrolux North America, Incorporated
20445 Emerald Parkway, S.W., Suite 250
Cleveland, Ohio 44135

RE: Information on Solid Waste Management Units (SWMUs)
Electrolux Home Products, 601 East Central Street, Jefferson, Iowa
EPA RCRA ID No. IAD047055140

Dear Mr. Heer:

Request for Information

We have reviewed the May 13, 2011 Phase II report prepared by Golder Associates which was forwarded to us by the Iowa Department of Natural Resources (IDNR). The IDNR does not implement the Resource Conservation and Recovery Act (RCRA), so after determining this site to be subject to RCRA they requested that the U.S. Environmental Protection Agency address the contamination. The Phase II report summarizes site operational history, geologic and hydrogeologic information and the results of soil and groundwater sampling conducted by Golder. The report also describes significant levels of hazardous chemicals in the groundwater at the Electrolux Home Products site in Jefferson, Iowa.

The Hazardous and Solid Waste Amendments of 1984 to the RCRA authorize the EPA to determine if any hazardous wastes or hazardous constituents have been released to any environmental media from solid waste management units (SWMUs). All SWMUs, including units used in the past, are considered in our determination.

Section 3007 of RCRA, 42 USC Section 6927, authorizes EPA to require that information be provided for the purpose of determining compliance with the federal hazardous waste regulations. Failure to provide the information requested in the enclosure to this letter may subject Electrolux to an enforcement action under Section 3008 of RCRA, 42 USC Section 6928. Enforcement actions may include the assessment of penalties of up to \$27,500 for each day of noncompliance.

Your facility may, if it desires, assert a business confidentiality claim covering part or all of the information submitted to, or reviewed by, EPA. Such a claim may be made by placing on (or attaching to) the information, at the time of its submittal to, or review by, EPA, a cover sheet, stamped or printed legend, or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Allegedly confidential portions of otherwise nonconfidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by EPA. If confidential treatment is sought only until a certain date or until the occurrence of a certain event, the request should so state.

AWMD/RCAP/CH:bft:10/04/11:H:AWMD/RCAP/Cores11/CH:SWMU3007.doc

RCAP	RCAP	CNSL	RCAP
Hutchison	Cryslor	Roberts	Slugantz
10/4/11	10/04/11	10/4/11	10/4/11

515401



RCRA

10-17-11 Electrolux
received 3007 Letter
Response is due to EPA
by November 23, 2011

Information submitted for which a claim of confidentiality is made will be disclosed by EPA only to the extent and by the means authorized by the procedures specified in Title 40 Code of Federal Regulations (CFR) Part 2, Subpart B. If no such claim is made when information is received by EPA, information may be made available to the public without further notice.

Please note that all information must be complete, accurate, and must include a certification by a principal corporate officer. An example of a certification statement follows our information request. Your response is due within thirty (30) days of your receipt of this letter. Please send it to the attention of Ms. Cynthia L. Hutchison, RCAP/AWMD, at the letterhead address. If you have any questions regarding this matter, please contact Ms. Hutchison at (913) 551-7478. Thank you for your cooperation in this matter.

Sincerely,

Lynn M. Slugantz, Chief
RCRA Corrective Action and Permits Branch
Air and Waste Management Division

Enclosure

cc: Cal Lundberg
Iowa Department of Natural Resources (w/encl)

REQUEST FOR INFORMATION

Pursuant to the provisions of Section 3007 of RCRA, EPA hereby requests that you provide the following information and copies of the following documents, to the extent that such information is available. Note that for the purposes of the following requests, the following definitions apply.

A **"Solid Waste Management Unit" (SWMU)** is defined as any unit from which hazardous waste or hazardous constituents might migrate. This definition applies to active as well as inactive units containing either hazardous wastes or solid wastes, or both. Examples of SWMUs include: landfills, surface impoundments, waste piles, land treatment units, incinerators, injection wells, above and below ground tanks (including 90-day accumulation tanks), transfer stations, and waste recycling operations. In addition, the Agency has interpreted the term to apply to areas associated with production processes which have become contaminated as a result of routine and systematic releases of hazardous waste or hazardous constituents (a product may become a waste if it is discarded or abandoned).

"Hazardous constituents" include those constituents listed in Appendix VIII to Title 40 Code of Federal Regulations (CFR) Part 261.

"Hazardous waste" means those solid wastes identified as hazardous waste in 40 CFR Part 261 and defined by Section 1004(5) of RCRA, 42 USC Section 6903(5).

"Facility" includes all contiguous property under the control of the owner or operator on November 8, 1984, on which units subject to permitting are located.

"Release" includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, but excluding releases otherwise permitted or authorized under the law (e.g., NPDES permitted discharges).

The terms **"furnish," "describe,"** or **"indicate"** mean turning over to EPA either originals or duplicate copies of the requested information in the possession, custody, and/or control of the owner or operator of the facility. Where specific documents do not exist which are responsive to an information request but such information is known, you may respond to the question with a written response, without providing documents.

"Hazardous substance" means (a) any substance designated pursuant to section 311(b)(2)(A) of the Federal Water Pollution Control Act; (b) any element, compound, mixture, solution, or substance designated pursuant to Section 102 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); (c) any hazardous waste having the characteristics identified under or listed pursuant to Section 3001 of RCRA (but not including any waste the regulation of which under RCRA has been suspended by Act of Congress); (d) any toxic pollutant listed under Section 307(a) of the Federal Water Pollution Control Act; (e) any hazardous air pollutant listed under Section 112 of the Clean Air Act; and (f) any imminently hazardous chemical substance or mixture with respect to which the Administrator has taken action pursuant to Section 7 of the Toxic Substances Control Act.

1. Provide a topographic map showing the facility property boundaries and the location of all known SWMUs whether currently in operation or not. This map should be drawn to a scale of 1 inch equals 200 feet and clearly indicate the location and size of all SWMUs. Alternate scales are acceptable if they clearly show all features requested. If there are no known SWMUs (e.g. surface impoundments, tanks, landfills, waste piles, etc.), so indicate in your response to EPA. There is no need to go on further with the response if this is the case.
 - a. For each SWMU identified, describe the type of unit (e.g., container, storage area, landfill, waste pile, etc.), and the dimensions of the unit.
 - b. For each SWMU identified, indicate the beginning and ending dates that the unit was in use.
 - c. For each SWMU identified, describe the quantity and type(s) of wastes managed in the unit.
 - d. For each SWMU identified, indicate the dates, quantity, and type(s) of any known release(s) of hazardous wastes or hazardous constituents from that SWMU.
 - e. Provide all information, data, and documentation concerning any releases occurring from a SWMU at your facility, including the results of any soil, air or water (ground or surface) testing that indicates presence of hazardous waste or hazardous constituents.
 - f. For each SWMU identified, describe any corrective action measures and any mitigating measures (e.g., replacement of water supplies) which have been completed or are currently underway to address any release(s).
2. On the map provided pursuant to item number 1 above, clearly indicate the location of all known units at your facility, other than SWMUs, whether currently in operation or not, which hold or have held hazardous substances and from which there have been releases of hazardous wastes or hazardous constituents.
 - a. For each unit identified, describe the type of unit (e.g., production area, underground storage tank) and the dimensions of the unit.
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3. On the map provided pursuant to item number 1 above, clearly indicate the location of all known water wells, e.g., drinking water, irrigation, groundwater monitoring. Please provide all permitted discharges, e.g., NPDES, air permits, etc.
4. On the map provided pursuant to item number 1 above, clearly indicate the location of all surface water, e.g., rivers, streams, lakes, ponds, retention basins, etc.

CERTIFICATION TO REQUEST FOR INFORMATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that, to the best of my knowledge, the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

NAME (print or type)

TITLE

SIGNATURE

Sworn to before me this

day of _____

Notary Public



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

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Sincerely,

A handwritten signature in black ink, appearing to read "Lynn M. Slugantz", with a stylized flourish at the end.

Lynn M. Slugantz, Chief
RCRA Corrective Action and Permits Branch
Air and Waste Management Division

Enclosure

cc: Cal Lundberg
Iowa Department of Natural Resources (w/encl)

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NAME (print or type)

TITLE

SIGNATURE

Sworn to before me this

day of _____

Notary Public

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
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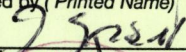
Mr. John Heer
Assistant General Counsel
Electrolux North America, Incorporated
20445 Emerald Parkway, S.W., Suite 250
Cleveland, Ohio 44135

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X☐ Agent☐ Addressee

B. Received by (Printed Name)



C. Date of Delivery

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

OCT 17 2011

Service Type

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4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number

(Transfer from service label)

7010 2780 0001 2210 3596

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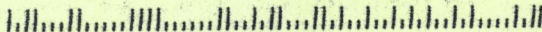
RCAP RECEIVED

OCT 20 2011

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
Region 7
901 N 5th Street
Kansas City, Kansas 66101

AWMD
RCAP

C. Hutchinson



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Mr. John Heer

Assistant General Counsel

Electrolux North America, Incorporated
20445 Emerald Parkway, S.W., Suite 250
Cleveland, Ohio 44135

Certified Mail Provides:

- A mailing receipt
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Important Reminders:

- Certified Mail may **ONLY** be combined with First-Class Mail® or Priority Mail®.
- Certified Mail is *not* available for any class of international mail.
- **NO INSURANCE COVERAGE IS PROVIDED** with Certified Mail. For valuables, please consider Insured or Registered Mail.
- For an additional fee, a *Return Receipt* may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "*Restricted Delivery*".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.

PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047